

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

Sherry Russell, Individually, and on behalf  
of All Others Similarly Situated,

Plaintiff,

- against -

Healthalliance Hospital Broadway Campus,  
and Ciox Health, LLC,

Defendants.

ECF Case 1:20-cv-01204-GLS-ATB

**DECLARATION OF JASON MARTIN IN SUPPORT OF DEFENDANTS  
HEALTHALLIANCE HOSPITAL BROADWAY CAMPUS'S AND CIOX HEALTH,  
LLC'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I, Jason Martin, the undersigned, declares as follows pursuant to 28 U.S.C. § 1746:

1. I am the Vice President of Collections at Ciox Health, LLC. I am fully familiar with the facts and circumstances of this action.
2. I submit this declaration, along with the exhibit annexed hereto, in support of Defendants Healthalliance Hospital Broadway Campus's and Ciox Health, LLC's Motion to Dismiss Plaintiff's Complaint.
3. Annexed hereto as Exhibit 1 is a true and correct copy of the letter dated April 20, 2020, submitted by the law firm of John H. Fisher, P.C., requesting electronic copies of medical records on behalf of Sherry Russell, as distribute of Charles Russell.

On this day, January 19, 2021, I declare under penalty of perjury that the foregoing is true

and correct.



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Jason Martin